

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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AKAMAI TECHNOLOGIES, INC. and  
AKAMAI SECURITIES CORPORATION,

Plaintiffs,

v.

DEUTSCHE BANK AG,

Defendant.

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) Civil Action No:  
) 10-CV-10254-JLT  
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**PLAINTIFFS' MOTION TO FOR LEAVE TO FILE UNDER SEAL ITS  
MEMORANDUM AND AFFIDAVIT IN OPPOSITION TO DEFENDANT'S MOTION  
FOR A PROTECTIVE ORDER AND IN SUPPORT OF AKAMAI'S CROSS-MOTION  
TO AMEND ITS LIST OF DEONENTS AND FOR SANCTIONS**

Plaintiffs Akamai Technologies, Inc. and Akamai Securities Corporation (collectively, "Akamai") hereby respectfully request leave of the court to file under seal their Memorandum of Law in Opposition to Defendant's Motion for a Protective Order and in Support of Akamai's Cross-Motion to Amend Its List of Deponents and for Sanctions, and the Affidavit of Jennifer E. Tracy. In support of this motion, Plaintiffs state as follows:

1. The parties have signed a Confidentiality Stipulation, dated July 13, 2011, governing the treatment of confidential material.

2. Plaintiffs' Memorandum of Law in Opposition to Defendant's Motion for a Protective Order and in Support of Akamai's Cross-Motion to Amend Its List of Deponents and for Sanctions, and its accompanying exhibits contain confidential information, including information from the related arbitration between Plaintiffs and Defendant Deutsche Bank AG's wholly owned subsidiary, Deutsche Bank Securities Inc. which has been designated confidential

pursuant to a confidentiality order entered in that action.

WHEREFORE, Plaintiffs Akamai Technologies, Inc. and Akamai Securities Corporation respectfully request that this Court grant its request for leave of court to file their memorandum, Affidavit of Jennifer E. Tracy, and accompanying exhibits under seal.

Dated: August 15, 2011

Respectfully submitted,

AKAMAI TECHNOLOGIES, INC. and AKAMAI  
SECURITIES CORPORATION

/s/ Jennifer E. Tracy  
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Jennifer E. Tracy (BBO #661539)  
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**CERTIFICATE UNDER LOCAL RULE 7.1(A)(2)**

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel for Akamai Technologies, Inc. and Akamai Securities Corporation hereby certifies that counsel for the Plaintiffs made a good faith effort to consult with counsel for Defendant before filing this motion, but was unable to reach counsel for Defendant.

/s/ Jennifer E. Tracy  
Jennifer E. Tracy

**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 15, 2011.

/s/ Jennifer E. Tracy  
Jennifer E. Tracy